

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 David A. Perlson (Bar No. 209502)
5 davidperlson@quinnemanuel.com
6 Melissa Baily (Bar No. 237649)
7 melissabaily@quinnemanuel.com
8 John Neukom (Bar No. 275887)
9 johnneukom@quinnemanuel.com
10 Jordan Jaffe (Bar No. 254886)
11 jordanjaffe@quinnemanuel.com
12 50 California Street, 22nd Floor
13 San Francisco, California 94111-4788
14 Telephone: (415) 875-6600
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **PLAINTIFF WAYMO LLC'S
24 ADMINISTRATIVE MOTION TO FILE
25 UNDER SEAL PORTIONS OF ITS
26 MOTION FOR ORDER TO SHOW
27 CAUSE WHY DEFENDANTS SHOULD
28 NOT BE HELD IN CONTEMPT OF THE
PRELIMINARY INJUNCTION ORDER
(Dkt. 426) AND EXPEDITED
DISCOVERY ORDER (Dkt. 61) AND
EXHIBITS 3, 5, AND 6 THERETO**

12 UBER TECHNOLOGIES, INC.;
13 OTTOMOTTO LLC; OTTO TRUCKING
14 LLC,

15 Defendants.

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Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its Motion for Order to Show Cause Why Defendants Should Not be Held in Contempt of the Preliminary Injunction Order (Dkt. 426) and Expedited Discovery Order (Dkt. 61) (“the Contempt Motion”) and Exhibits 3, 5, and 6 thereto, filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Contempt Motion	Highlighted in Blue	Defendants
Exhibits 3, 5, and 6	Entire Documents	Defendants

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. UBER’S CONFIDENTIAL INFORMATION

Waymo seeks to seal the portions of the Sur-Reply and supporting exhibits only because Defendants have designated the information confidential and/or highly confidential. Declaration of Patrick Schmidt (“Schmidt Decl.”) ¶ 3. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

III. CONCLUSION

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

DATED: June 21, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC